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F. #2015R01313

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

S U P E R S E D I N G
I N D I C T M E N T

- against -

ALI SALEH,

Defendant.

Cr. No. 15-517 (S-1) (WFK)
(T. 18, U.S.C., §§ 2, 981(a)(1)(C) and (G),
2339B(a)(1) and 3551 et seq.; T. 21, U.S.C.,
§ 853(p); T. 28, U.S.C., § 2461(c))

- - - - -X

THE GRAND JURY CHARGES:

COUNT ONE

(Attempt to Provide Material Support to a Foreign Terrorist Organization)

1. In or about and between August 2014 and September 2014, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ALI SALEH, together with others, did knowingly and intentionally attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including personnel, including himself, to a foreign terrorist organization, to wit: the Islamic State of Iraq and the Levant.

(Title 18, United States Code, Sections 2339B(a)(1), 2 and 3551 et seq.)

COUNT TWO

(Attempt to Provide Material Support to a Foreign Terrorist Organization)

2. In or about October 2014, within the Eastern District of New York and elsewhere, the defendant ALI SALEH, together with others, did knowingly and intentionally

attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including personnel, to a foreign terrorist organization, to wit: the Islamic State of Iraq and the Levant.

(Title 18, United States Code, Sections 2339B(a)(1), 2 and 3551 et seq.)

COUNT THREE

(Attempt to Provide Material Support to a Foreign Terrorist Organization)

3. In or about and between July 2015 and August 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ALI SALEH, together with others, did knowingly and intentionally attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including personnel, including himself, to a foreign terrorist organization, to wit: the Islamic State of Iraq and the Levant.

(Title 18, United States Code, Sections 2339B(a)(1), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

4. The United States hereby gives notice to the defendant ALI SALEH that, upon his conviction of any of the above offenses, the government will seek forfeiture in accordance with (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any property, real or personal, constituting or derived from proceeds traceable to such offenses, and/or (b) Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c), which require the forfeiture of all assets, foreign or domestic: (i) of any individual, entity, or organization engaged in planning or perpetrating any Federal crime of terrorism against the

United States, citizens or residents of the United States, or their property, and all assets, foreign or domestic, affording any person a source of influence over any such entity or organization; (ii) acquired or maintained by any person with the intent and for the purpose of supporting, planning, conducting, or concealing any Federal crime of terrorism against the United States, citizens or residents of the United States, or their property; (iii) derived from, involved in, or used or intended to be used to commit any Federal crime of terrorism against the United States, citizens or residents of the United States, or their property; or (iv) of any individual, entity or organization engaged in planning or perpetrating any act of international terrorism against any international organization or against any foreign Government.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be


divided without difficulty;

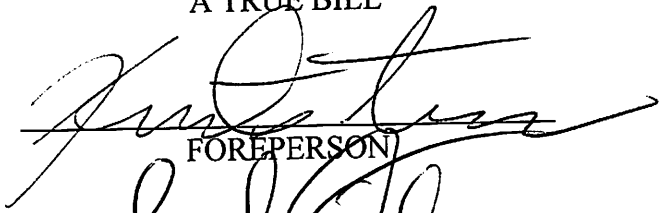
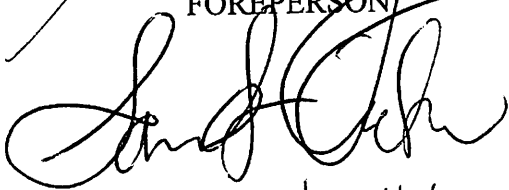
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

(Title 18, United States Code, Sections 981(a)(1)(C) and (G); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

ROBERT L. CAPERS
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. 0.136

A TRUE BILL

FOREPERSON

Secretary

F. #2015R01313
FORM DBD-34
JUN. 85

No. 15-517 (S-1) (WFK)

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

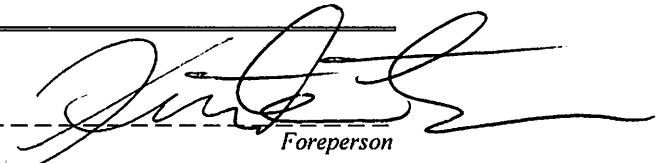
ALI SALEH,

Defendant.

SUPERSEDING INDICTMENT

(T. 18, U.S.C., §§ 2, 981(a)(1)(C) and (G), 2339B(a)(1) and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.


Foreperson

Filed in open court this _____ day,

of _____ A.D. 20____

Clerk

Bail, \$ _____

Saritha Komatireddy, Assistant U.S. Attorney (718) 254-6054